office, and the Lords of Appeal in Ordinary. The Lord Chancellor is appointed by the Prime Minister, and as he is a member of the Cabinet, presiding officer of the House of Lords, and goes out with his party, his position as judge is anomalous. His functions as a judge of the Chancery Division, seldom exercised since 1875, have now been formally taken away. All the other judges are appointed by patent from the Crown on the advice of the Lord Chancellor, and hold office during good behavior.

THE LIMITATIONS IN CHUDLEIGH'S CASE. — One of the best examples in the books of the ingenuity of early conveyancers is to be found in *Chudleigh's Case*, 1 Rep. 114. One Richard Chudleigh, Knight, there appears as grantor in a deed by which lands were conveyed to trustees in fee to the use of the said Chudleigh and his heirs on the body of Elizabeth, then wife of Richard Bampfield, lawfully to be begotten; for default of such issue, to the use of said Chudleigh and his heirs on the body of Laurentia, wife of Robert Fulford, lawfully to be begotten; and so on until the names of four other married women had been similarly employed; finally, if Chudleigh should die without issue by any of them, then, after his death, the trustees were to hold the estate to their own use during his eldest son Christopher's life, and after his death, to the use of his first and other sons successively in tail.

The curious form of these limitations has often been noticed. A correspondent in the January number of the Law Quarterly Review calls attention to an explanation of them in Popham, 70, 76, where there is a report of the case under the name of *Dillon* v. *Fraine*. "In as much as the manner of assurance made by Sir Richard Chudleigh may seem strange, and in some manner to touch the reputation of the said Sir Richard (who was a grave and honest gentleman) to those who heare it, and do not know the reason why he did it," Popham says that it is only just to add a word of explanation. And he proceeds to relate how Sir Richard's son Christopher had committed murder and fled to France, and the father, doubting what would become of his estate if he should die before settling it, and yet wishing to retain the power of destroying, by a common recovery, any settlement he might make, had been advised by counsel to convey the land in the above manner. He thus succeeded in preventing his son Christopher from inheriting the estate, and at the same time did not prejudice his other issue, "because he never had a purpose to marry with any of these wives." The reason why so many married women were introduced into the settlement would appear to be, as the writer in the Law Quarterly Review remarks, to guard against the contingency of Sir Richard being left tenant in tail after possibility of issue extinct; which would have hindered him in suffering a recovery.

WHEN WILL EQUITY SET ASIDE A VOLUNTARY SETTLEMENT? — Under what circumstances a party shall be allowed to revoke his own voluntary settlement of property, containing no power of revocation, is a question on which there has been much fluctuation of opinion in both England and America. In the recent case of *Richards* v. *Reeves*, 45 N. E. Rep. 624 (Ind.), the court, in deciding that the maker of an improvident voluntary settlement, without a power of revocation, might have had it set aside, state the rule to be "that in a voluntary settlement the absence